



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

September 16, 2015

Mr. Peter A. Gardner  
Site Vice President  
Monticello Nuclear Generating Plant  
Northern States Power Company, Minnesota  
2807 West County Road 75  
Monticello, MN 55362-9637

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT  
BASELINE EMERGENCY PREPAREDNESS BIENNIAL EXERCISE INSPECTION  
REPORT 05000263/2015502

Dear Mr. Gardner:

On August 21, 2015, the U.S. Nuclear Regulatory Commission (NRC) completed a baseline emergency preparedness biennial exercise inspection at the Monticello Nuclear Generating Plant. The enclosed report documents the results of this inspection, which were discussed on August 21, 2015, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations, and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. No findings were identified during this inspection.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Brian J. Kemker, Acting Chief  
Plant Support Branch  
Division of Reactor Safety

Docket No. 50-263  
License No. DPR-22

Enclosure:  
IR 05000263/2015502 w/Attachment:  
Supplemental Information

cc w/encl: Distribution via LISTSERV®

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-263  
License No: DPR-22

Report No: 05000263/2015502

Licensee: Northern States Power Company

Facility: Monticello Nuclear Generating Plant

Location: Monticello, MN

Dates: August 17 – 21, 2015

Inspectors: G. Hansen, Physical Security Inspector  
N. Valos, Senior Reactor Analyst  
P. LaFlamme, Resident Inspector  
D. Smith, Emergency Preparedness Specialist  
F. Tran, Health Physicist

Approved by: B. Kemker, Acting Chief  
Plant Support Branch  
Division of Reactor Safety

Enclosure

## **SUMMARY**

IR 05000263/2015502; 08/17/2015 – 08/21/2015; Monticello Nuclear Generating Plant; Baseline Emergency Preparedness Exercise Evaluation - Hostile Action Event; Exercise Evaluation Scenario Review; Performance Indicator Verification.

This report covers a one-week period of announced baseline inspection by three regional inspectors, one resident inspector, and one emergency preparedness specialist. The U.S. Nuclear Regulatory Commission's (NRC's) program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 5, dated February 2014.

### **NRC-Identified and Self-Revealed Findings**

#### **Cornerstone: Emergency Preparedness**

No findings were identified.

### **Licensee-Identified Violations**

None

## **REPORT DETAILS**

### **1. REACTOR SAFETY**

#### **Cornerstone: Emergency Preparedness**

#### **1EP7 Exercise Evaluation – Hostile Action Event (71114.07)**

##### **.1 Exercise Evaluation**

##### **a. Inspection Scope**

Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Appendix E, Section IV.F.2.j, requires, in part, that nuclear power reactor licensees, in each eight calendar year exercise cycle, provide the opportunity for their Emergency Response Organization (ERO) to demonstrate proficiency in the key skills necessary to respond to a Hostile Action (HA) event directed at the plant site. Monticello Nuclear Generating Plant staff designed the August 18, 2015, exercise to satisfy this requirement, and the U.S. Nuclear Regulatory Commission (NRC) inspected the Monticello Nuclear Generating Plant HA exercise to assess the licensee's ability to effectively implement their Emergency Plan during a HA event and adequately protect public health and safety.

The exercise evaluation consisted of the following reviews and assessments:

- The adequacy of the licensee's performance in the biennial exercise conducted on August 18, 2015, regarding the implementation of the Risk-Significant Planning Standards in 10 CFR 50.47 (b)(4), (5), (9), and (10), which address emergency classification, offsite notification, radiological assessment, and Protective Action Recommendations (PARs), respectively.
- The overall adequacy of the licensee's emergency response facilities with regard to NUREG-0696, "Functional Criteria for Emergency Response Facilities," and Emergency Plan commitments. The facilities assessed were the Emergency Operations Facility, Alternate Technical Support Center, Alternate Operations Support Center, Control Room Simulator, Incident Command Post, and the Central Alarm Station.
- A review of other performance areas such as the licensee ERO's recognition of abnormal plant conditions; command and control, including interactions with site security staff; intra and inter-facility communications; prioritization of mitigating activities; utilization of repair and field monitoring teams; interface with offsite agencies, including local law enforcement agencies; staffing and procedure adequacy; and the overall implementation of the Emergency Plan and its implementing procedures.
- Past performance issues from NRC inspection reports to determine the effectiveness of corrective actions, as demonstrated during this exercise, to ensure compliance with 10 CFR 50.47(b)(14).

- The adequacy of the licensee's post-exercise critiques, to evaluate Monticello Nuclear Generating Plant's self-assessment of its ERO performance during the May 20, 2015, exercise, and to ensure compliance with 10 CFR Part 50, Appendix E, Section IV.F.2.g.

The inspectors reviewed various documents that are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the exercise evaluation on a biennial basis.

This exercise evaluation inspection constituted one sample as defined in Inspection Procedure (IP) 71114.07-06.

b. Findings

No findings were identified.

1EP8 Exercise Evaluation – Scenario Review (71114.08)

a. Inspection Scope

Prior to the inspection activity, the inspectors conducted an in-office review of the exercise objectives and scenarios submitted to the NRC using IP 71114.08, "Exercise Evaluation - Scenario Review," to determine if the exercise would test major elements of the Emergency Plan, as required by 10 CFR 50.47(b)(14). This inspection activity represents one sample on a biennial cycle.

The inspectors reviewed various documents that are listed in the Attachment to this report. This inspection activity satisfied one inspection sample for the exercise evaluation on a biennial basis.

This review of the exercise objectives and scenario constituted one sample as defined in IP 71114.08-06.

b. Findings

No findings were identified.

**4. OTHER ACTIVITIES**

**Cornerstone: Emergency Preparedness**

4OA1 Performance Indicator Verification (71151)

.1 Drill/Exercise Performance

a. Inspection Scope

The inspectors sampled licensee submittals for the Drill/Exercise Performance (DEP) Performance Indicator (PI) for the second quarter of 2014 through the second quarter of 2015. To determine the accuracy of the DEP data reported during those periods, PI definitions and guidance contained in the Nuclear Energy Institute (NEI) document NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, was used. The inspectors reviewed the licensee's records associated with the PI to verify

that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes, including procedural guidance on assessing opportunities for the PI, assessments of PI opportunities during pre-designated control room simulator training sessions, and performance during other drills. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one DEP PI verification inspection sample as defined in IP 71151-05.

b. Findings

No findings were identified.

.2 Emergency Response Organization Drill Participation

a. Inspection Scope

The inspectors sampled licensee submittals for the ERO Drill Participation PI for the second quarter of 2014 through the second quarter of 2015. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, was used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI, performance during the 2014 and 2015 drills, and revisions of the roster of personnel assigned to key ERO positions. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one ERO Drill Participation PI verification inspection sample as defined in IP 71151-05.

b. Findings

No findings were identified.

.3 Alert and Notification System

a. Inspection Scope

The inspectors sampled licensee submittals for the Alert and Notification System (ANS) PI for the second quarter of 2014 through the second quarter of 2015. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 7, was used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI and results of periodic scheduled ANS operability tests. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one ANS PI verification inspection sample as defined in IP 71151-05.

b. Findings

No findings were identified.

4OA6 Management Meetings

.1 Exit Meeting Summary

On August 21, 2015, the inspectors presented the biennial exercise inspection results to Mr. P. Gardner, and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

.2 Public and Media Briefing

On August 21, 2015, the inspectors summarized the NRC's preliminary exercise inspection conclusions at a public and media briefing hosted by Department of Homeland Security/Federal Emergency Management Agency, Region V, Field Office staff, at the Wright County Emergency Operations Center, in Buffalo, Minnesota.

ATTACHMENT: SUPPLEMENTAL INFORMATION

## **SUPPLEMENTAL INFORMATION**

### **KEY POINTS OF CONTACT**

#### Licensee

P. Gardner, Site Vice President  
K. Scott, Director of Site Operations  
H. Hanson, Jr., Plant Manager  
A. Ward, Regulatory Affairs Manager  
M. Kelly, Performance Assessment Manager  
T. Taylor, Nuclear Oversight  
L. Anderson, Emergency Preparedness Manager  
S. Genschaw, Emergency Preparedness  
K. Nyberg, Manager, Nuclear Security  
S. O'Connor, Regulatory Analyst  
A. Kouba, Regulatory Affairs

#### U.S. Nuclear Regulatory Commission

P. Zurawski, Senior Resident Inspector  
P. Voss, Resident Inspector

### **LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED**

#### Opened, Closed, and Discussed

None



## LIST OF DOCUMENTS REVIEWED

The following is a partial list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

### 1EP7 Exercise Evaluation – Hostile Action Event (71114.07)

E-PLAN; Emergency Plan; Revision 46

A.2-001; Emergency Organization; Revision 54

A.2-101; Classification of Emergencies; Revision 49

A.2-102; Notification of Unusual Event; Revision 22

A.2-103; Alert; Revision 21

A.2-104; Site Area Emergency; Revision 21

A.2-105; General Emergency; Revision 23

A.2-106; Activation and Operation of the TSC; Revision 36

A.2-108; Access Control during Emergencies; Revision 18

A.2-109; Activation and Operation of the Back-up OSC; Revision 11

A.2-201; On-Site Protective Action; Revision 19

A.2-202; Off-Site Monitoring during an Emergency; Revision 12

A.2-204; Off-Site Protective Action Recommendations; Revision 26

A.2-205; Personnel Accountability; Revision 17

A.2-206; Work Control during Emergencies; Revision 10

A.2-301; Emergency Evacuation; Revision 19

A.2-305; Personnel Accountability Following a Security Event; Revision 0

A.2-401; Emergency Exposure Control; Revision 9

A.2-802; Activation and Operation of EOF; Revision 18

A.2-807; Off-Site Dose Assessment and Protective Action Recommendations;  
Revision 24

A.2-810; Transfer to Backup EOF; Revision 5

A.2-805; Tech Support in the EOF; Revision 11

A.2-411; Establishment of Secondary Access Control Point; Revision 6

A.2-411; Establishment of Secondary Access Control Point; Revision 6

FP-PA-ARP-01; CAP Action Request Process; Revision 41

Two-Year List of Drill and Exercise Condition Reports;  
Dated August 2013 – August 2015

Two Years of Drill and Exercise Timelines; Dated August 2013 – August 2015

AR 01392722; EP Drill – Responsibility for Offsite Notifications; Dated August 7, 2013

AR 01408108; A.2-301 Emergency Evacuation procedure gap;  
Dated November 25, 2013

AR 01415109; Recommend extra staffing during major winter storms;  
Dated January 7, 2014

AR 01431940; EP Drill Confusion on Operational vs. Activated; Dated May 23, 2014

AR 01482128; ERO Duty Team response issue during June 5, 2015 call-in drill;  
Dated November 6, 2014

AR 01419033; EP Drill – Procedure Improvements Needed; Dated February 14, 2014

AR 01431944; EP Drill Control of facility during HAB event; Dated May 23, 2014

AR 01471166; ERO Position Owner gap for TSC/OSC Communicators;  
Dated March 23, 2015

AR 01394727; ERO potential trend in off-site drill notification failures;  
Dated August 26, 2013

AR 01437523; EP NRC Inspection - Backup ANS; Dated July 8, 2014

AR 01481897; EP HAB Drill - No method to communicate with Teams;  
Dated June 4, 2015

AR 01461789; Satellite Phone Issue; Dated January 9, 2015

AR 01470698; EP HAB Drill - No RP Field Team kits in EOF;  
Dated March 9, 2015

1EP8 Exercise Evaluation – Scenario Review (71114.08)

Monticello Nuclear Generating Plant 2015 HAB Exercise 60 Day Submittal;  
Dated June 2015

4OA1 Performance Indicator Verification (71151)

ERO Drill Participation; Second Quarter of 2014 – Second Quarter of 2015

DEP Opportunities; Second Quarter of 2014 – Second Quarter of 2015

ANS Reliability; Second Quarter of 2014 – Second Quarter of 2015

## LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access and Management System
ANS	Alert and Notification System
10 CFR	Title 10 of the <i>Code of Federal Regulations</i>
DEP	Drill and Exercise Performance
ERO	Emergency Response Organization
HA	Hostile Action
IP	Inspection Procedure
NEI	Nuclear Energy Institute
NRC	U.S. Nuclear Regulatory Commission
PAR	Protective Action Recommendation
PARS	Publicly Available Records System
PI	Performance Indicator

Mr. Peter A. Gardner  
Site Vice President  
Monticello Nuclear Generating Plant  
Northern States Power Company, Minnesota  
2807 West County Road 75  
Monticello, MN 55362-9637

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT  
BASELINE EMERGENCY PREPAREDNESS BIENNIAL EXERCISE INSPECTION  
REPORT 05000263/2015502

Dear Mr. Gardner:

On August 21, 2015, the U.S. Nuclear Regulatory Commission (NRC) completed a baseline emergency preparedness biennial exercise inspection at the Monticello Nuclear Generating Plant. The enclosed report documents the results of this inspection, which were discussed on August 21, 2015, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations, and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. No findings were identified during this inspection.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Brian J. Kemker, Acting Chief  
Plant Support Branch  
Division of Reactor Safety

Docket No. 50-263  
License No. DPR-22

Enclosure:  
IR 05000263/2015502 w/Attachment:  
Supplemental Information

cc w/encl: Distribution via LISTSERV®

DISTRIBUTION w/encl:  
See next page

ADAMS Accession Number ML15259A415

☒ Publicly Available ☐ Non-Publicly Available ☐ Sensitive ☒ Non-Sensitive

To receive a copy of this document, indicate in the concurrence box "C" = Copy without attach/encl "E" = Copy with attach/encl "N" = No copy

OFFICE	RIII	RIII	RIII	RIII
NAME	DFunk for GHansen:jw	DFunk	BKemker	
DATE	09/16/15	09/16/15	09/16/15	

OFFICIAL RECORD COPY

Letter to Mr. Peter A. Gardner from Mr. Brian J. Kemker dated September 16, 2015.

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT  
BASELINE EMERGENCY PREPAREDNESS BIENNIAL EXERCISE INSPECTION  
REPORT 05000263/2015502

DISTRIBUTION w/encl:

Janelle Jessie  
RidsNrrDorlLpl3-1 Resource  
RidsNrrPMMonticello  
RidsNrrDirslrib Resource  
Cynthia Pederson  
Darrell Roberts  
Richard Skokowski  
Allan Barker  
Carole Ariano  
Linda Linn  
DRPIII  
DRSIII  
Jim Clay  
Carmen Olteanu  
[ROPreports.Resource@nrc.gov](mailto:ROPreports.Resource@nrc.gov)